

**FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

BILLY BRANTLEY, et al.

Plaintiffs,

V.

CINERGY CORP.

Defendant.

Case No. C-1-01-378

**Judge Susan J. Dlott**

PLAINTIFF, BILLY BRANTLEY'S,  
DECLARATION AS TO  
AUTHENTICATION OF  
DOCUMENTS

### DECLARATION OF BILLY BRANTLEY

My name is Billy Brantley, and I am a plaintiff in the above-styled case. I make this declaration based on facts personally known to me.

1. The attached documents are true and correct copies of documents I obtained in my employment with Cincinnati Gas & Electric Co., which I understand to be business records of the company's regularly conducted business activities and which were made and kept as a regular practice of that business.

I declare under penalty of perjury that the foregoing is true and correct. Signed on this 22 day of September 2004 in Cincinnati, Ohio.

Billy Brantley  
Billy Brantley



Doc 14

Cinergy Corp.  
139 East Fourth Street  
P.O. Box 960  
Cincinnati, OH 45201-0960

Date: January 12, 1999  
To: Billy Brantley  
2853 Saturn Drive  
Fairfield, OH 45014  
From: Dave Crail  
Coordinator, Disability Benefits  
Subject: Short Term Disability

**CINERGY.**

This office has been notified that you will soon be placed on Short Term Disability (STD). In an effort to assist you, the following provisions have been outlined that employees are asked to follow while on STD.

1. You must be under the care of a physician and provide certification from the physician that you should be absent from work because of a covered illness or injury. Medical documentation needs to be provided by every employee receiving Short Term Disability (STD) benefits, even though the employee may have returned to work before the imposed documentation deadline stated in the paragraph below.

Please complete the top section of the enclosed Disability Report(s) authorizing your physician(s) to release any medical information acquired in the course of your examination and treatment. This form is to be forwarded to your treating physician as soon as possible for completion in full. Preferably the form can be **FAXED** to me at (513) 287-4212. Please return the completed form by Tuesday, January 19<sup>th</sup>.

**NOTE:** If you already have documentation from your physician which indicates your diagnosis and dates of disability, please forward this information to me. In addition, you will need to return the Disability Report providing your signature ("Employee's Signature") and the physician's name at the bottom of the report.

2. Take proper care of yourself while disabled.
3. Follow the recommendations of the examining physician(s).
4. Let me know if you are planning to be away from your usual place of residence for more than three (3) consecutive days. (It is important to maintain communication to ensure appropriate medical treatment and assist you in returning to work.)

We will work with you, your physician and supervisor to monitor medical treatment. Physician certification of your continued disability may periodically be requested. In addition, you may be requested to submit to examinations by a physician or physicians selected by the Company.

Cinergy does have a Limited Work Program for employees who are not totally disabled. If, at any time, you are able to work, even in a limited capacity, your physician will be asked to provide me with the date you can return to work and detailed listing of your restrictions/limitations. The Company will attempt to accommodate you with appropriate job duties until you are able to return to your normal job responsibilities.

This time away from work is being applied towards FMLA. If you have questions about your STD benefits, I am available to assist you. Please feel to call me at (513) 287-3288 or 1-800-262-3000, Extension 3288.



**ADDENDUM TO CERTIFICATE OF COVERAGE  
CINERGY CORP.  
GROUP #6000, 6001, 6002, 6003, 6004 & 6005**

Effective January 1, 2000, your Certificate of Coverage is hereby modified as follows:

**Section I  
Eligibility, Enrollment, and Effective Date Of Coverage**

Item a under the subsection "Eligibility," "The Subscriber" is modified to read as follows:

- a. Be an eligible full-time or part-time employee as defined by the Enrolling Unit, or a retiree of the Enrolling Unit who is under age sixty-five (65).

Item c. under the subsection "Eligibility," "The Subscriber" is modified to read as follows:

- c. Be entitled to participate in group coverage for current employees or retirees of the Enrolling Unit, as determined by the Enrolling Unit and according to the terms of the Master Group Contract.

Item b under the subsection "Eligibility," "Eligible Family Dependents include," is modified to read as follows:

- b. Your Dependent Children. A Dependent Child includes your biological child, step-child, legal adopted child or Ward who:
  - Is unmarried;
  - Is not employed on a full-time basis; and
  - Is under age nineteen (19) or, if a full-time student enrolled in an accredited educational institution for at least nine (9) credit hours, as determined by the Enrolling Unit, under age twenty-five (25).

All references to "age nineteen (19)" under item 3, "Your Handicapped Child" of the subsection entitled "Eligibility" are changed to "age nineteen (19), or if a full-time student enrolled in an accredited educational institution for at least nine (9) credit hours, as determined by the Enrolling Unit, age twenty-five (25)".

**Section IV  
Covered Services**

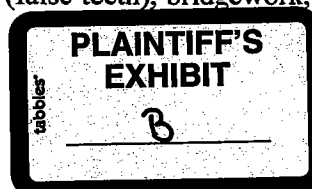
A fourth bullet entitled **Reconstructive Procedures** under the **Dental Services** subsection is added in its entirety to read as follows:

- ***Reconstructive Procedures***

Expenses for dental work, oral surgery, and limited orthodontic treatment are covered without Copayment if they are for the repair of an Injury to the jaw, mouth or face or if they are for the removal, repair, replacement, restoration, or repositioning of sound natural teeth damaged, lost, or removed due to Injury. Mandatory Prior Authorization is required. Expenses for such services are covered when provided by a Participating Provider designated by ChoiceCare under these conditions:

The Member was covered under this Plan when the accident causing the Injury occurred;

- A denial of benefits for non-covered dental services from your dental plan is received by ChoiceCare;
- Treatment is received within twenty-four (24) months following the date of the accident, or longer when Medically Necessary if required for the completion of the full course of treatment needed as a result of the initial Injury;
- The teeth that were damaged, lost, or removed were in good condition at the time of the Injury; and
- Charges are for the initial limited orthodontic treatment needed as a result of the Injury, or charges are for the installation of the first crowns (caps), dentures (false teeth), bridgework, and in-mouth appliances needed as a result of the Injury.



IF THE REQUEST NUMBER FOR THE POSTED JOB OPENING IS NOT INCLUDED ON YOUR RESUME, IT CANNOT BE TRACKED TO THE POSITION YOU ARE APPLYING FOR AND WILL NOT BE PROCESSED.

An Equal Opportunity Employer. Minority, Female, Disabled, Disabled Veteran, Vietnam Era Veteran.

## Job Opportunity Bulletin

IF THE REQUEST NUMBER FOR THE POSTED JOB OPENING IS NOT INCLUDED ON YOUR RESUME, IT CANNOT BE TRACKED TO THE POSITION YOU ARE APPLYING FOR AND WILL NOT BE PROCESSED.

EXTERNAL APPLICANTS MAY APPLY FOR THIS POSITION  
Friday, March 10, 2000

RESUMES MUST BE RECEIVED IN STAFFING SERVICES BY THE END OF THE BUSINESS DAY  
Friday, March 24, 2000

VACANT POSITION: LINEPERSON C  
NO. OF POSITIONS: 8  
REPRESENTED BY: IBEW Local 1347  
LOCATION: BRECON TRAINING FACILITY/ VARIOUS LOCATIONS AS ASSIGNED  
DIVISION/DEPT.: T&D PROJECTS EAST  
REQUEST NO.: 00-0000083  
SALARY RANGE: \$17.97/hr. - \$18.62/hr.

**JOB SUMMARY:** Vacancies exist in the Overhead Linework progression that must be filled. Due to the need for additional qualified lineworkers at Cinergy east, individuals accepted for these vacancies will enter the Overhead Linework progression at the Lineworker 'C' job classification and will participate in an accelerated training program. Consequently, the qualifications of candidates for these positions will be closely scrutinized in terms of former training, experience and demonstrated ability. Consistent with the Company's transfer policy, internal candidates will compete with external candidates for these positions. Priority order for the consideration of internal candidates for these positions will be as follows: eligible bidders from the Cinergy east IBEW pool, others currently in jobs represented by Local 1347 IBEW, pool status employees from other Cinergy east bargaining units and employees in other Cinergy east bargaining unit job classifications respectively. Selected candidates will also be required to successfully complete a practical demonstration session.

A Lineworker 'C' must have a valid drivers license and must be able to obtain a Federal Commercial Drivers License (CDL) - Age requirement to obtain this CDL is 21 years of age. Operating a line truck, digging equipment, small equipment and power tools is also a requirement. Must be able to climb poles to perform heavy electrical construction and maintenance work, removal and installation of poles, transformers, line conductors, etc. Must be able to inspect, investigate, problem solve make limited decisions regarding service equipment. Comprehend, retain and follow oral and written communications to carry out work orders. Communicate via two-way radio when in field. Effectively communicate with co-workers and customers. The Lineworker 'C' is exposed to multiple outside work sites, loud noise, dust, dirt, mud and a variety of weather conditions. In addition, is exposed to potentially life-threatening situations while working on energized electrical equipment from substantial heights. The Lineworker 'C' participates in continued technical training and works overtime on a regular basis. Travel may be required to work in Indiana.

**REQUIREMENTS:** High school diploma or equivalent. Must be able to obtain a Federal Commercial Drivers License (CDL). Age requirement to obtain this CDL is 21 years of age. Must qualify on current Manual test battery administered in Staffing Services. Manual position pre-test booklets are available in Staffing. You will receive a booklet should you be invited for testing. A physical examination may also be required. Successful candidates will also be required to pass the examination for entrance into the grade of Lineworker 'C'. This position falls under the requirements of the Lineman Improvement Program which requires promotion to the maximum level within a specific time frame. Failure to do so will result in termination.

**DESIRED COMPETENCIES:** CUSTOMER SERVICE ORIENTATION, TEAM PLAYER, PROBLEM SOLVING, ACHIEVEMENT ORIENTATION, MOTIVATIONAL FIT, SAFETY AWARENESS, PRODUCTIVITY, TOLERANCE FOR STRESS.

THIS POSITION REPORTS TO: Ken Toebe, T&D Projects East

EMAIL RESUME WITH REQUEST NO. TO: [resumes@cinergy.com](mailto:resumes@cinergy.com).

Please type your resume in the text area of the e-mail message INCLUDING THE REQUEST NO. AT THE BEGINNING OF THE TEXT. When submitting your resume you must include work history (including job title and listing of responsibilities) and education to be considered for the position. Do not attach the resume document into the message or send resume and cover letter separately. If you do not have access to e-mail, please forward a hard copy to Staffing Services, 65 Mezz. Your resume must be received by the end of business day on the date indicated above.

IF THE REQUEST NUMBER FOR THE POSTED JOB OPENING IS NOT INCLUDED ON YOUR RESUME, IT CANNOT BE TRACKED TO THE POSITION YOU ARE APPLYING FOR AND WILL NOT BE PROCESSED.

An Equal Opportunity Employer. Minority, Female, Disabled, Disabled Veteran, Vietnam Era Veteran.

## Job Opportunity Bulletin

PLAINTIFF'S  
EXHIBIT

C

8-4-99  
8-11-99

**HARTWELL  
DIVERSITY  
VISION**

**TO ACHIEVE CINERGY'S GOALS AT HARTWELL WE WILL  
CREATE AN INCLUSIVE WORKPLACE WHERE EMPLOYEES  
CAN DEVELOP THEIR TALENTS AND SKILLS, COMMUNICATE  
OPENLY, AND ARE VALUED REGARDLESS OF RACE,  
GENDER, WORK LOCATION, MANAGEMENT STATUS, OR ANY  
OTHER DIVERSITY DIMENSION. AT HARTWELL, TRUST,  
RESPECT, UNDERSTANDING AND COLLABORATION WILL BE  
THE WAY WE CONDUCT BUSINESS.**

**PLAINTIFF'S  
EXHIBIT**

**D**

**From:** Woodard, Arnita  
**Sent:** Wednesday, September 23, 1998 4:30 PM  
**To:** Blackmon, Prather; Lewis, Lori; Ranford, Deborah; Bryant, Leslie; McConico, Elaine; Anderson, Randall; Rose, Bruce; Johnson, Sam; Bradley, Suzanne  
**Cc:** Woodard, Arnita  
**Subject:** Rogers Meeting

Below are ideas brainstormed during the CPC monthly meeting, September 16 and September 21, 1998. **Our last meeting**, before we meet with Jim, is **Sept 28 at 5:30pm on the 26<sup>th</sup> floor (DPO conference room)**. This meeting is mandatory for those who have not attended previous meetings. Everyone planning to attend the meeting with Jim Rogers on Wednesday, Sept 30 (time and place forth coming) needs to be on the same page!

The question that sparked these brainstorming ideas was, "WHAT DO WE WANT?":

- Mergers and acquisitions, joint ventures--During the due diligence process would you give us the assurance to include our concerns?
- Mandatory succession planning (tied to bonuses/pay of general managers and above) **Arnita**
- African American (AA) females in upper management (general manager and above)
- Include the breadth and depth of the candidate pool (Deb, breadth is spelled correctly)
- Recruit from Historically Black Colleges and Universities (HBCU) **Cynthia**
- Enhance employment packages offered to individuals attending those colleges
- Enlist AA employees in the recruitment process when attending AA colleges
- Hire AA in HR in the recruitment area
  - non AA employees with no HR experience/education are hired-then trained
  - allow flexibility for all employees
- More precise look at AA already working in Cinergy
- More officer representation/involvement at AA events (MLK Breakfast, Black Achievers, UNCF Telethon, Urban League, etc.) **Lori**
- Increased monetary contributions to UNCF

Questions we would like Jim to answer:

- What programs/ideas have been put into place since the EEO letter by Jerry Liggett, dated 2/98?
- What are your thoughts on the Detroit Edison Litigation? **Pete**
- What are the expectations of the Cinergy Choir and what does company support look like for the choir?(reference letter choir sent to Jim Rogers) **Elaine**

#### Possible Solutions

1. Mandatory succession planning
2. Advisory board that assists HR in: hiring from HBCU, career days, speaking at conferences, campus tours etc.
3. Increase the numbers of AA employees in top management at Cinergy to surpass the numbers of the top 5 utility companies (5 in 5 on 5).

#### Assignments:

- Deb Ranford - Contact Packer and Gladney from AABE about succession planning and article
- Cynthia Smith - Contact Suzanne Bradley about rating system and industry average for AA in top management
- Leslie Bryant - Contact associate at 5/3 Bank about succession planning
- Arnita Woodard - Contact associate at Star Bank about succession planning, purchase Fortune magazine, and contact Berlinda Fontenot-Jamerson
- Bruce Rose - Contact associate at P & G about succession planning





**REDACTED***Attorney-Client Privilege***NOTICE OF TEMPORARY JOB ASSIGNMENT**

**Job Title:** Temporary Training Crew Lead Person  
**Location:** Various  
**Openings:** One

**Duties:**

- Senior Lineperson "A" duties
- Responsible for the field and informal classroom training of Line person "C" and safety operations.
- Completion of the necessary training documentation.

**Qualifications:**

- Must have three (3) years experience as a Line person "A" or Line person "A" Trouble
- Must possess a suitable personality and desire to function as an effective trainer.
- Must have good communication skills.
- Must have demonstrated to the satisfaction of Supervisors, during routine operations, the ability to follow procedures and instructions.
- Must be able to read drawings and complete work assignments in accordance with company specifications, standards and procedures.
- Must process tact and a clean neat appearance for contact with the Company's customers.
- Must have a valid Commercial Drivers License.
- Must be able to use a telephone and mobile radio to receive and transmit information pertaining to the work operations.
- Must be able to make clear and legible written record of all operations.

**Additional Company, Union agreements for this Job Notice:**

- Training Crew Lead Person will be entitled to overtime arising from their home district.
- Vacations will be based on home district.
- Upon completion of the training period this person will return to their home headquarters.

**Applications for this position must be received no later than Thursday, Aug 10, 2000.  
Return signed form to Ron Lewis, Project Crew, Fairfield District.**

**Name:** \_\_\_\_\_**Date:** \_\_\_\_\_**0015**Plt's 2nd  
Prod. to Dft

2874 Skiffers

**REDACTED**

*Attorney-Client Privilege*

## Targeted Selection

*A Competency - Based Interview Process*

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**Cinergy Corp.**

**PLAINTIFF'S  
EXHIBIT**

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### **The Interview Process**

Cinergy has an Interview Process known as Targeted Selection. This process will be used to select the most qualified candidate for all future job openings.

In Targeted Selection interviews, you will be asked questions based on Competencies. Competencies define the knowledge, skills, or behavior a person needs to be successful in the position for which you are interviewing.

Using "competency-based" questions, the interviewer tries to obtain from you, the interviewee, examples of past work-related behaviors. Finding out in the interview what you have done in the past is the heart of the Targeted Selection process. Behavior in one situation usually predicts behavior in a similar situation at a later time. Once the interviewer knows what you have done on the job in the past, he or she can more accurately predict the behaviors, skills, decisions you will repeat in the future.

### **The Interview's Goal - Obtain Behavioral Examples**

In Targeted Selection, the decision to offer you a job is based on the behavioral information you provide to the interviewer. Relating useful information about your past experiences and accomplishments is more than just telling about actions taken or not taken by you. Knowing your actions is of little use to an interviewer if he or she does not understand the circumstances surrounding the actions and the results produced by the actions. In responding to a competency-based question you need to relate:

1. The Situation or Task (responsibilities) which lead to your Action;
2. The specific Actions taken or not taken by you; and
3. The Results or changes caused by these Actions.

When you provide information to an interviewer which contains these three ingredients, the information is called a behavioral example. A convenient way to remember each ingredient of a behavioral example is to use the word "STAR" to describe a complete example.

S = Situation

T = Task

A = Action

R = Result

### **The Star Components of a Behavioral Example**

#### **Situation or Task**

Every behavioral example you provide needs to contain information that lets the interviewer know "why" an Action took place. Knowing the Situation or Task allows the interviewer to place the Action in a "context".

Example: "Part of my job is to check the billing statements we send to clients. When I returned from vacation, a big stack was waiting for me."

#### **Action**

Actions are what people say and do. They are the steps taken in completing a work assignment, how someone lays out work, or interacts with others.

Example: "As soon as I got to the office I reviewed the previous two weeks' bills. It took me about six hours."

#### **Result**

A Result is the outcome or consequence of Actions. The interviewer must understand whether the Actions were effective in changing or somehow affecting the original Situation. Knowing this third component of a behavioral example allows the interviewer to evaluate the effectiveness of your entire behavior.

Example: "I was able to uncover a major billing error where we undercharged a client more than \$7,500."

### **What Isn't a Behavioral Example**

To understand the definition of a behavioral example more completely, an explanation of what a behavioral example is not may be helpful. Behavioral examples are not:

#### **Feelings and Opinions**

"I went beyond the call of duty for my manager."

"I was really great at managing people in a participative manner."

Theoretical or Future-oriented Statements

"I plan to start work on my degree next year."

"Good management theory states you need to involve your people."

Vague Statements

"My absences from work were average - just like everyone else."

"There weren't too many times when I missed a deadline."

Feelings and Opinions provide no insight into behavior. Responding to an interviewer's questions in this way is providing nothing more than what might be your emotional reaction to some situation or event. Theoretical or Future-oriented statements provide the interviewer with no example of past behavior. They just indicate what an applicant thinks he or she would do or should do - not what has been done. Vague Statements are general summaries or descriptions of several past actions. They are far too general and can be interpreted many ways.

Preparing for Your Targeted Selection Interview

The first step in preparing for your interview is to obtain the list of competencies identified for the job you are interviewing for. This list can either be obtained from the "hiring manager" or by calling Staffing Services in Cincinnati at (513) 287-3402 or by calling Staffing Services in Plainfield at (317) 838-1256. Next you will want to review the competency definitions and example, consider how you will respond to competency-based interview questions related to your past work experiences.

# **Competency Guide**

## **and**

# **Sample Interview**

# **Questions**

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**ACHIEVEMENT ORIENTATION** - Setting high, personally derived goals or standards of performance for self and expecting similarly high goals and performance from all employees and the organization.

**Key Behaviors:**

- Consistently demonstrates a sense of urgency in getting the job done.
- Plans for and manages multiple assignments and projects effectively, while maintaining priorities and meeting deadlines.
- Consistently looks for better, faster, more cost-effective and efficient ways of achieving results.
- Takes action to achieve goals beyond regular scope of responsibility.

**Interview Guide Questions:**

1. Have you suggested any new ideas to your boss recently? What happened to the ideas?
2. Can you think of some projects or ideas (not necessarily your own) that were sold, implemented, or carried out successfully primarily because of your efforts?

**ADAPTABILITY** - Staying effective in varying environments, tasks and responsibilities. Or with different people.

**Key Behaviors:**

- Maintains effectiveness when experiencing changes in organizational structure, management, location, procedures, systems or priorities.
- Interacts effectively with people from different organizations internally and externally.
- Maintains departmental effectiveness in spite of unexpected sickness, absences, vacations, etc.
- Performs different tasks depending on needs.
- Handles disruptions in order to meet deadlines.

**Interview Guide Questions:**

1. Tell me about some situations in which you had to adjust quickly to changes in organizational or departmental priorities. How did the changes affect you?

(Adaptability Cont'd.)

2. Have you ever had to meet scheduled deadlines during a time when your work was being continually disrupted? What caused you the most difficulty and why?

**ANALYSIS/PROBLEM SOLVING** - Identifying problems, securing relevant information, clarifying key issues, considering alternative solutions and taking the steps to solve the problem and prevent recurrence.

Key Behaviors:

- Synthesizes complex data and diverse viewpoints; identifies important issues and alternatives in making decisions.
- Develops alternatives to situations and problems and considers their consequences.
- Consistently makes good decisions and follows up in a timely and effective manner to ensure that appropriate action takes place.
- Applies what was learned from successes and mistakes to solve new problems.

Interview Guide Questions:

1. What kind of information have you been required to analyze? Describe one of your most difficult analyses.
2. Describe the most satisfying troubleshooting you have done. Contrast this with a time when you were stumped.

**ATTENTION TO DETAIL** - Accomplishing tasks through concern for all areas involved, no matter how small; showing concern for all aspects of the job; accurately checking processes and tasks; maintaining watchfulness over a period of time.

Key Behaviors:

- Reviews all parts of a job to ensure quality.
- Completes reports, orders, or other documentation accurately.
- Proofs own work to identify errors or omissions.
- Ensures that all details of a task are accomplished.
- Keeps track of many small details without forgetting some items
- Watches processes closely for any deviations from the acceptable range

(Attention to Detail Cont'd.)



Interview Guide Questions:

1. Describe a time when you identified an error or problem that had escaped others' attention.
2. Describe a situation or process that you handled that required close attention or adherence to prescribed procedures. Give an example where your close attention paid off.

**COMMUNICATION** - Communicating in a thorough, clear and timely manner which supports information sharing and goal achievement and manages this impact through clear communications and timely feedback on decisions.

Key Behaviors:

- Seeks first to understand; then to be understood.
- Organizes and expresses both written and spoken ideas clearly and concisely so that others understand.
- Expresses ideas in a way that builds commitment, even when the ideas are unfamiliar or unpopular.
- Fully informs and involves others in a timely manner.

Interview Guide Questions:

1. What different approaches have you used in presenting to different audiences? Give me a specific example? How did you know you were getting your ideas across?
2. What different approaches have you used in presenting to different audiences? Give me a specific example? How did you know you were getting your ideas across?

**CUSTOMER SERVICE ORIENTATION** - Indicating through actions and decisions a sense of importance of understanding and serving the customer (both internal and external); anticipating customer needs; taking actions to overcome obstacles and seeking solutions to satisfy customers.

Key Behaviors:

(Customer Service Cont'd.)

- Takes responsibility to solve customer problems.

- Listens to and understands the customer.
- Is patient and understanding with customers who make unreasonable demands.
- Provides quick and thorough service to customer's requests or problems.
- Balances business needs with customer requests.
- Makes fulfilling customer needs a priority.
- Works with an appropriate sense of urgency.

Interview Guide Question:

1. How much customer (internal/external) interaction do (did) you have in your job? What percentage of your time are you spending with customers? Tell me about one of those interactions.
2. Sooner or later we all have to deal with a customer who has unreasonable demands. Think of a time when you had to handle unreasonable requests. What did you do?

**DECISION MAKING** - Weighing alternatives and making decisions that reflect the facts of a situation. Taking into account the impact of the decisions on employees. Basing decisions on logical assumptions that take into consideration the Company's financial, organizational and human resources.

Key Behaviors:

- Checks to see if the proposed action would satisfy the need.
- Considers the pros and cons before making a decision.
- Considers the risks involved.
- Makes decisions not directly covered by organizational policies or procedures.
- Considers multiple factors (e.g. customer's needs, feasibility, due dates, costs, etc.) when making decisions.

Interview Guide Questions:

1. On which decisions have you deliberated the longest? Tell me about them. Describe a specific decision.

(Decision Making Cont'd.)

2. Think of a good decision you made and a recent decision that wasn't. What did you do differently in making those decisions?

**DEVELOPING ORGANIZATIONAL TALENT** - Developing others' skills and competencies by planning effective development activities related to current and future jobs.

**Key Behaviors:**

- Evaluates employees performance. Discusses performance with employees on a regular basis.
- Provides performance feedback to employees in a manner that maintains/enhances their self-esteem even when tough messages on non-performance are delivered.
- Supports others in identifying development needs, designing or locating appropriate development situations and motivating others to develop themselves.
- Recognizes others' efforts and contributions to successful achievements.
- Helps develop others' ability to think through problems and understand the implications of all decisions.
- Delegates both responsibility and authority when making assignments.

**Interview Guide Questions:**

1. Have you had any employees who were released because they didn't work out? Why were they released? Did you do anything to work with them in problem areas before they were released? What?
2. Who is (1) your most effective subordinate and (2) your least effective subordinate? What are the strengths and weaknesses of each? What have you done to develop the career needs of these subordinates?

**DIVERSITY APPRECIATION** - Promoting an understanding of the value of diversity in the workforce. Creating an awareness of the dynamics that operate in a diverse workforce and creating an environment where diversity is recognized and managed to enhance the business.

**Key Behaviors:**

(Diversity Appreciation Cont'd.)

- Develops teams which represent and capitalize on difference in terms of race, gender, background and personal style.
- Encourages multiple perspectives to generate creative business-building ideas and solutions.

- Recognizes and deals with stereotypical attitudes and behaviors.

Interview Guide Questions:

1. What steps have you taken in your current position to build a "diverse" work team? In what ways are they diverse?
2. How have you or how would you manage a situation where an employee resisted working with someone else because of issues related to race, gender, disability or age?

**ENTREPRENEURIAL ACTION** - Seizing opportunities to increase current business or to expand into new markets.

Key Behaviors:

- Tries different and novel ways to deal with organizational problems and opportunities.
- Creates new markets and products which will expand the Company's value to shareholders.
- Encourages others to experiment with and develop innovative ideas to grow the business.

Interview Guide Questions:

1. Have you ever been in a situation in which you were able to anticipate the need for a totally new product or service? What did you do about it?
2. Describe a time when you were able to see the potential for new technologies or methods in delivering or producing products and services. What did you do about it?

**INDIVIDUAL LEADERSHIP** - Using proper interpersonal styles and methods to guide individuals or groups. Maintaining group cohesiveness and cooperation, facilitating group process and gaining agreement/commitment to ideas, plans or courses of action.

Key Behaviors:

- Changes style and methods, as necessary, to achieve a goal.
- Uses different leadership styles relative to the needs of individuals and different leadership situations.

- Gains others' understanding and commitment to courses of action.
- Gains commitment to try new ways to do a job or process.

Interview Guide Questions:

1. How have you led others in solving a problem? Example.
2. We've all tried different ways of showing consideration for others. In what ways have you shown consideration?

**INNOVATION / CONTINUOUS IMPROVEMENT** - Generating original and creative solutions to work situations, and challenging the status quo to improve processes and maximize results.

Key Behaviors:

- Develops new approaches to improve or replace existing procedures or systems.
- Consistently tries new ideas that could improve the way the organization does business.
- Welcomes unusual ideas; looks beyond common solutions, "tried and true" methods.
- Looks at problems/situations/opportunities from diverse points of view (customer, organization, supplier, producer, employee, etc.).

Interview Guide Questions:

1. What new approaches have you created to help your division or department improve or replace existing procedures, systems, or policies?
2. When you consider an opportunity for innovation, describe the process you use to evaluate the downside risk? How do you assess the potential benefits?

**INTERPERSONAL SKILLS / SENSITIVITY** - Taking actions that indicate a consideration for the feelings and needs of others; being aware of the impact of one's own behavior on others.

Key Behaviors:

- Maintains or enhances a direct report's self-esteem when interacting with her/him.

2. What are the most significant changes you have brought about in an organization?

**MANAGING PARTICIPATIVELY** - Demonstrating an understanding and a commitment to participative management through the effective use of a variety of participative methods and techniques. Appropriately involving employees, peers and other stakeholders in planning, goal setting, decision making and other managerial responsibilities.

Key Behaviors:

- Accepts others' ideas and empowers others to participate in implementing those ideas.
- Appropriately delegates responsibility and authority.
- Provides support without removing responsibility for action.
- Empowers employees to make decisions that take into consideration the Company's financial, material, organizational and human resources.
- Provides opportunity for and uses skills in encouraging questions and soliciting feedback.
- Communicates concerns directly and diplomatically; anticipates the receiver's concerns.

Interview Guide Questions:

1. Give me an example in which you had an option or prerogative to "speak and lead", but chose instead to "listen and follow." Tell why you made that choice and describe the results. Were you happy with your decision?
2. Describe an occasion when you relinquished a leadership role to allow a subordinate or colleague the visibility and recognition they had earned.

**MOTIVATIONAL FIT** - The extent to which job activities and responsibilities and the organization's mode of operation and values are consistent with the type of environment that provides personal satisfaction; the degree to which the work itself is personally satisfying.

Key Behaviors:

- Aware of opportunities for promotion.
- Work with detailed information.
- Work as part of a team.
- Conduct routine activities.



- Achieve difficult departmental and/or organizational goals highly visible to others in the organization.
- Use a variety of one's skills.
- Operate various types of machinery.
- Spend long hours at work.
- Work on a variety of projects at one time.

Interview Guide Questions:

1. What do you like best about your job as a \_\_\_\_\_? Why? Examples.
2. All jobs have their frustrations and problems. Describe some specific tasks or conditions that have been frustrating to you. Why were they frustrating?

**ORGANIZATIONAL AWARENESS** - To gain a greater perspective of the organization through gathering knowledge of systems and cultures inside the organization and identifying potential organizational problems and opportunities.

Key Behaviors:

- Demonstrates knowledge of organizational policies, changes and activities in the organization.
- Demonstrates knowledge of the business in which the organization is involved.
- Demonstrates the understanding of the organization's structure, operations, decision-making channels, planning processes and financial budget control systems.
- Interacts effectively with people at various organizational levels or positions.

Interview Guide Questions:

(Organizational Awareness Cont'd.)

1. Give me an example of how your knowledge of your organization's culture helped you make a decision.
2. Give me an example of a time when you anticipated the changing needs of another department/group/team. (What action did you take as a result of anticipating this changing need?)

**PLANNING AND ORGANIZING** - Establishing a course of action to accomplish a specific goal; planning appropriate allocation of resources.



Key Behaviors:

- Allocates time to accomplish a variety of tasks.
- Anticipates issues and creates contingency plans.
- Prepares materials ahead of time for projects and presentations.
- Meets milestones and completes projects.
- Plans for follow-up activities as needed.
- Handles multiple assignments and projects while maintaining priorities.
- Defines parameters within which work must be completed.

Interview Guide Questions:

1. What types of scheduling have you done on your job? Tell me about some of the things you've had to schedule.
2. Has your time schedule ever been upset by unforeseen circumstances? What did you do then? Give me a recent example.

**SAFETY AWARENESS** - Being aware of conditions that affect employee safety.

Key Behaviors:

- Displays knowledge of all related safety or security regulations.
- Documents or monitors safety or security violations.
- Recommends or improves safety or security procedures.
- Demonstrates or explains safety equipment or procedures.
- Is aware of the safety of other workers while performing maintenance.
- Confronts others about safety or security violations.

(Safety Awareness Cont'd.)

Interview Guide Questions:

1. Give me some examples of safety procedures that are/were part of your job at \_\_\_\_\_. How did they affect the work you did? Give me a specific example.
2. In your job, did you notice any process or task that was being done unsafely (unsafe machinery/equipment/worker)? How did you come to notice it? What did you do?

**SALES ABILITY / PERSUASIVENESS** - Using appropriate interpersonal styles and communication methods to gain acceptance of an idea, plan, activity or product from prospects and clientele.

**Key Behaviors:**

- Presents compelling arguments to support positions.
- Determines clients' needs and interests.
- Relates benefits to clients' needs and interests.
- Highlights advantages or benefits of products or services to individuals and the organization.
- Responds to objections.
- Chooses an appropriate approach to gain agreement to an idea or course of action.
- Relates the benefits of ideas or recommendations to the needs and interests of individuals.
- Persuades other people or departments to meet commitments when demands on their time conflict.

**Interview Guide Questions:**

1. Tell me about a time when you persuaded someone to do something. What was the situation? How was the person persuaded?
2. What are some of the best ideas you ever sold to a superior or peer? What was your approach?

**TEAM PLAYER** - Active participation in, and facilitation of, team effectiveness. Demonstrating commitment and willingness to focus individual effort to ensure the (Team Player Cont'd.)

success of the team, department or company. Knows when and is able to let go of an individual agenda for the success of the larger goal.

**Key Behaviors:**

- Works proactively across organizations to achieve group goals and facilitate cohesiveness.
- Respects and works effectively with diverse people and enables everyone to contribute their best work.
- Builds agreement and support among key stakeholders, customers and decision makers.

- Stimulates open and productive dialogue among team members, direct reports, peers and Senior Management.

Interview Guide Questions:

1. Describe a situation in which you were able to help out a peer or co-worker.
2. Have you ever had any difficulty getting along with co-workers? How did you handle the situation?

**TECHNICAL AND PROFESSIONAL PROFICIENCY** - Achieving a high level of performance in specific technical and professional areas.

Key Behaviors:

- Demonstrates technical expertise.
- Uses technical processes and knowledge not easily or quickly learned on the job.
- Accomplishes complex tasks without assistance in areas of expertise.
- Produces high quality work.

Interview Guide Questions:

1. What are some examples of projects that demonstrate your technical expertise?
2. Give me an example of the most complex assignments or projects you have had. What were your roles?

**FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

BILLY BRANTLEY, et al.	)	
	)	
Plaintiffs,	)	Case No. C-1-01-378
	)	
	)	<b>Judge Susan J. Dlott</b>
v.	)	
	)	PLAINTIFF, TODD TOLBERT'S,
	)	DECLARATION AS TO
CINERGY CORP.	)	AUTHENTICATION OF
	)	DOCUMENTS
	)	
Defendant.	)	

**DECLARATION OF TODD TOLBERT**

My name is Todd Tolbert, and I am a plaintiff in the above-styled case. I make this declaration based on facts personally known to me.

1. The attached documents are true and correct copies of documents I obtained in my employment with Cincinnati Gas & Electric Co., which I understand to be business records of the company's regularly conducted business activities and which were made and kept as a regular practice of that business.

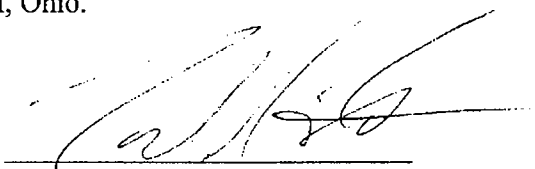
2. My weight, which has varied since 1995 from about two-hundred and sixty-seven to three-hundred and twenty-eight pounds, substantially limits me in a variety of physical activities, including running and climbing (for example, as to climbing stairs and hills) as compared to the average person in the general population. When my weight has been above 300 pounds it has caused extra stress on my joints (knees and ankles) such that attempting to exercise put me in



substantial pain and required me to discontinue the exercise. Even when I could complete my exercise I was in such pain that I was unable to perform household duties, but was forced to remain sedentary to recuperate. The exercise was necessary to maintain my health and try to combat my excessive weight. When my weight was above 300 pounds I also could not climb stairs or hills like the average person but instead I would have to rest to recover my energy where the average person would not have needed to.

3. Due to my excessive weight, I have recently been forced to undergo gastric bypass surgery. This extreme measure was taken to insure my long-term health.

I declare under penalty of perjury that the foregoing is true and correct. Signed on this 22 day of September 2004 in Cincinnati, Ohio.



Todd Tolbert

February 3, 2000

Todd Tolbert  
7322 Park Dale  
Cincinnati, Ohio 45237

**CINERGY.**

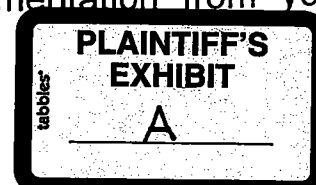
Dear Mr. Tolbert:

Reference is made to our discussion on Tuesday, February 1, 2000 to discuss your progress in meeting your job requirements. Also in attendance were S. Murrison and your union representative T. Pfaffinger.

It was discussed that since April 1, 1999 we have been addressing the fact that your body weight exceeds the limitations of various equipment used to perform the essential duties of your job classification. It was determined that you were to lose at least five pounds per month to achieve and maintain the weight of 275 lbs. in proper work attire by February 1, 2000. These facts were documented in my letter to you dated June 7, 1999.

In December 1999 the fact that you were not making satisfactory progress on your weight loss was addressed with you. At that time you were informed that if you failed to physically qualify to perform your full duties by February 1, 2000, there may be no option other than to place you into another job for which you qualify, if available. It was also stated that if an alternate job was not available, your employment with the Company could be in jeopardy. My letter to you dated December 2, 1999 documents this event.

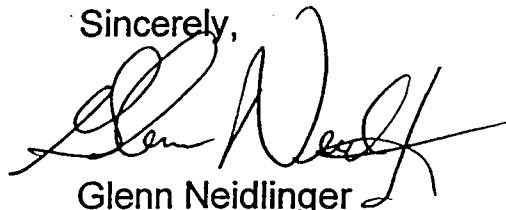
On February 1, 2000, you were weighed at the company Medical Division. Your weight at that time was 304.5 lbs., which still exceeds the 275 lb. requirement. As a result, you were informed that you were being temporarily demoted to the Groundperson job classification effective immediately and your wage rate would be adjusted to the maximum rate of that job classification effective February 7, 2000. You were instructed to provide medical documentation from your



dietician as to the rate of weight loss that would be appropriate for you at the present time. I informed you on February 3, 2000 that it was necessary that you provide that documentation to the company Medical Division no later than February 11, 2000. After that information is received, the Medical Division will determine what rate of weight loss should be expected and a time frame for you to achieve 275 lbs. Your progress will be monitored bi-weekly.

You were also informed that if you fail to demonstrate acceptable progress in meeting your required weight loss at any time within the time frame determined, disciplinary action, up to and including discharge could result.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Neidlinger", with a stylized flourish at the end.

Glenn Neidlinger  
Field Supervisor  
T&D Projects East

CC: K. Toebbe  
F. Kelly  
K. Williams (2)  
R. Monson  
File



7/27/00 Todd Wilk  
297.7 Weight *[Signature]*

Cinergy Corp.  
139 East Fourth Street  
P.O. Box 960  
Cincinnati, OH 45201-0960

**CINERGY.**



## DISABILITY REPORT

LF 16-269 R 6/01

**CINERGY®**

EMPLOYEE'S NAME <i>Todd Tolbert</i>	HOME PHONE <i>(513) 521-9844</i>	EMPLOYEE NUMBER <i>84975</i>	BIRTHDATE <i>12-15-67</i>
EMPLOYEE'S ADDRESS, CITY, STATE, ZIP <i>8563 Daly Rd #3 Cincinnati, OH 45231</i>		IMMEDIATE SUPERVISOR'S NAME <i>S. Munison</i>	WORK LOCATION <i>Bacon Oval</i>

## AUTHORIZATION FOR RELEASE OF MEDICAL INFORMATION

By this document, I hereby authorize you to permit Cinergy Corp., 139 East Fourth Street, Cincinnati, Ohio 45202, the right to review, inspect, and copy any and all reports and records, medical and hospital, with regard to my physical/mental condition and treatment thereof which is related to my current disability claim. The undersigned further waives and releases any physician from any restriction imposed by the law from disclosing or revealing any record pertaining to my current disability claim or pre-existing condition relevant to the claim to Cinergy Corp. A photocopy or facsimile of this release is as valid as the original.

X *[Signature]*  
EMPLOYEE'S SIGNATURE

*9-18-01*  
DATE

## PHYSICIAN - PLEASE NOTE

THIS REPORT IS REQUIRED TO INITIATE OR CONTINUE DISABILITY BENEFITS. BENEFITS CANNOT BE PAID UNTIL THIS FORM IS COMPLETED AND RETURNED. If disability has ended or if you have not seen the patient recently, please so indicate. Your prompt attention to this form is appreciated. Any fee for this form's completion is the employee's responsibility. CINERGY HAS A LIMITED WORK PROGRAM FOR EMPLOYEES WHO ARE NOT TOTALLY DISABLED. We will work with the employee and you to accommodate for limitations/restrictions until the employee can return to regular job duties.

ATTENDING PHYSICIAN'S STATEMENT		MUST BE COMPLETED FOR BEHAVIORAL HEALTH DISABILITY DIAGNOSES: (DSM-IV)	
DIAGNOSIS AND CONCURRENT CONDITIONS <i>Major Depressive Sgl - Mod</i>		Axis I: <i>Major Depressive</i>	Axis IV: <i>Severe</i>
ICD 9 _____ CPT _____		Axis II: <i>Depn</i>	Axis V: <i>60</i>
TREATMENT PLAN (PLEASE BE SPECIFIC) <i>Medications and therapy</i>		Axis III: <i>None</i>	
		IS THE PATIENT STILL UNDER YOUR CARE FOR THIS CONDITION?	
		<input type="checkbox"/> Yes, NEXT APPOINTMENT _____	
		<input type="checkbox"/> No, TERMINATION DATE _____	
		LENGTH OF TOTAL DISABILITY, IF ANY	
		FROM _____ THRU _____	
		DATES OF OTHER MEDICAL TREATMENT, IF ANY	
		OFFICE _____ HOSPITAL _____	

WORK STATUS		<input type="checkbox"/> RETURN TO REGULAR WORK DATE <i>October 15, 2001</i>	
<input type="checkbox"/> RETURN TO LIMITED WORK DATE _____		EXPECTED DURATION OF LIMITED WORK _____	
<input type="checkbox"/> NO PUSHING OR PULLING		<input type="checkbox"/> NO BENDING, STOOPING OR TWISTING	
<input type="checkbox"/> NO LIFTING > _____ POUNDS		<input type="checkbox"/> RIGHT/LEFT HANDED WORK ONLY (PLEASE CIRCLE RT OR LT)	
<input type="checkbox"/> NO PROLONGED STANDING/WALKING		<input type="checkbox"/> NO WORK ABOVE SHOULDERS	
<input type="checkbox"/> MEDICATIONS (THAT MIGHT AFFECT WORK SAFETY)		<input type="checkbox"/> GROUND WORK ONLY	
1. _____		<input type="checkbox"/> NO CLIMBING LADDERS	
2. _____		<input type="checkbox"/> OTHER _____	

ATTENDING PHYSICIAN - PLEASE PRINT <i>Anna Khalil MD</i>	TELEPHONE NUMBER <i>513-522-3120</i>	ATTENDING PHYSICIAN'S SIGNATURE <i>[Signature]</i>	DATE <i>9-19-01</i>
STREET ADDRESS <i>8696 Winton Rd</i>	CITY/TOWN <i>Cincinnati</i>	STATE <i>OH</i>	ZIP CODE <i>45231</i>

**FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

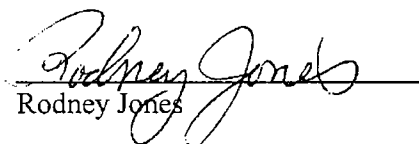
BILLY BRANTLEY, et al.	)	
	)	
Plaintiffs,	)	Case No. C-1-01-378
	)	
	)	<b>Judge Susan J. Dlott</b>
v.	)	
	)	PLAINTIFF, RODNEY JONES,
	)	DECLARATION AS TO
	)	AUTHENTICATION OF
CINERGY CORP.	)	DOCUMENTS
	)	
Defendant.	)	

**DECLARATION OF RODNEY JONES**

My name is Rodney Jones, and I am a plaintiff in the above-styled case. I make this declaration based on facts personally known to me.

1. The attached documents are true and correct copies of documents I obtained in my employment with Cincinnati Gas & Electric Co., which I understand to be business records of the company's regularly conducted business activities and which were made and kept as a regular practice of that business.

I declare under penalty of perjury that the foregoing is true and correct. Signed on this 23 day of September 2004 in Cincinnati, Ohio.

  
Rodney Jones



Cinergy Corp.  
139 East Fourth Street  
P.O. Box 960  
Cincinnati, OH 45201-0960

January 19, 1999

Rodney V. Jones  
11449 Lincolnshire  
Forest Park, OH 45240



Dear Rodney:

Congratulations! You are invited to participate in step two of the testing procedure for the position of Lineperson C at Cinergy. Step two of the testing process is the physical assessment test.

The physical assessment testing will be administered the week of January 25, at Cinergy's Brecon Training Facility located at 7600 East Kemper Road, Cincinnati, Ohio. I will contact you to schedule a time for you to take the physical assessment. Two maps are enclosed. You will be required to report to the Brecon Training Center (Building #3 on the "Detail" map) at your scheduled test time. The testing process will last 3 ½ to 4 hours.

Also enclosed, please find a Candidate Preparation Package to help you prepare for the Lineperson C simulation. It is very important that you not only wear the appropriate clothing, but that you also dress warmly since the majority of your assessment will be outside.

Please wear the following:

- Long sleeve shirt
- Work pants or jeans
- some type of work boots (no sneakers or cowboy boots).

I am also enclosing a Targeted Selection booklet. **Please note:** This does not guarantee you an interview; however, it will give you an opportunity to better prepare yourself if you are selected to interview.

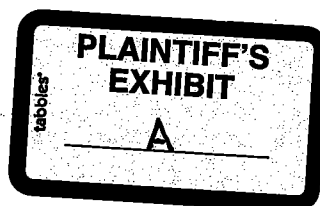
You will be contacted January 29 or 30, informing you whether or not you receive an interview. For those who receive an interview, the interviews will be scheduled the week of February 1, 1999. If you have any questions, feel free to contact me at (513) 287-3088.

Your test results will be kept on file in Human Resources for a period of five years. If you have further questions, please feel free to call me.

Sincerely,

A handwritten signature in cursive script that reads "Bernadette Reinhard".

Bernadette A. Reinhard  
Staffing Consultant



**INTERNAL CORRESPONDENCE**

To: Rodney Jones  
From: Carla Helms  
Subject: Manual Technician  
Date: 8/20/97

Reply By:

**CINERGY.**

You have been selected for the position of Manual Technician located at Fairfield. You have been released from your current duties in Materials Management effective September 1, 1997. Please report to Fairfield on September 2, 1997 at 7:00 a.m, to Ron Lewis, 829-3801, and Ron Stewart, 287-4605.

Training is scheduled for August 26, 27 and 28 at Brecon Training Facility from 7:00 a.m. to 4:00 p.m.

If you have any questions or need any assistance, please call me at 287-1583.

Cc: A. Perkins



The Cincinnati Gas & Electric Company

PSI Energy, Inc.

must be received by the end of business day on the date indicated above.

IF THE REQUEST NUMBER FOR THE POSTED JOB OPENING IS NOT INCLUDED ON YOUR RESUME, IT CANNOT BE TRACKED TO THE POSITION YOU ARE APPLYING FOR AND WILL NOT BE PROCESSED.

An Equal Opportunity Employer. Minority, Female, Disabled, Disabled Veteran, Vietnam Era Veteran.

## Job Opportunity Bulletin

IF THE REQUEST NUMBER FOR THE POSTED JOB OPENING IS NOT INCLUDED ON YOUR RESUME, IT CANNOT BE TRACKED TO THE POSITION YOU ARE APPLYING FOR AND WILL NOT BE PROCESSED.

EXTERNAL APPLICANTS MAY APPLY FOR THIS POSITION  
Friday, March 10, 2000

RESUMES MUST BE RECEIVED IN STAFFING SERVICES BY THE END OF THE BUSINESS DAY  
Friday, March 24, 2000

VACANT POSITION: LINEPERSON C  
NO. OF POSITIONS: 8  
REPRESENTED BY: IBEW Local 1347  
LOCATION: BRECON TRAINING FACILITY/ VARIOUS LOCATIONS AS ASSIGNED  
DIVISION/DEPT.: T&D PROJECTS EAST  
REQUEST NO.: 00-0000083  
SALARY RANGE: \$17.97/hr. - \$18.62/hr.

**JOB SUMMARY:** Vacancies exist in the Overhead Linework progression that must be filled. Due to the need for additional qualified lineworkers at Cinergy east, individuals accepted for these vacancies will enter the Overhead Linework progression at the Lineperson 'C' job classification and will participate in an accelerated training program. Consequently, the qualifications of candidates for these positions will be closely scrutinized in terms of former training, experience and demonstrated ability. Consistent with the Company's transfer policy, internal candidates will compete with external candidates for these positions. Priority order for the consideration of internal candidates for these positions will be as follows: eligible bidders from the Cinergy east IBEW pool, others currently in jobs represented by Local 1347 IBEW, pool status employees from other Cinergy east bargaining units and employees in other Cinergy east bargaining unit job classifications respectively. Selected candidates will also be required to successfully complete a practical demonstration session.

A Lineperson 'C' must have a valid drivers license and must be able to obtain a Federal Commercial Drivers License (CDL) - Age requirement to obtain this CDL is 21 years of age. Operating a line truck, digging equipment, small equipment and power tools is also a requirement. Must be able to climb poles to perform heavy electrical construction and maintenance work, removal and installation of poles, transformers, line conductors, etc. Must be able to inspect, investigate, problem solve make limited decisions regarding service equipment. Comprehend, retain and follow oral and written communications to carry out work orders. Communicate via two-way radio when in field. Effectively communicate with co-workers and customers. The Lineperson 'C' is exposed to multiple outside work sites, loud noise, dust, dirt, mud and a variety of weather conditions. In addition, is exposed to potentially life-threatening situations while working on energized electrical equipment from substantial heights. The Lineperson 'C' participates in continued technical training and works overtime on a regular basis. Travel may be required to work in Indiana.

**REQUIREMENTS:** High school diploma or equivalent. Must be able to obtain a Federal Commercial Drivers License (CDL). Age requirement to obtain this CDL is 21 years of age. Must qualify on current Manual test battery administered in Staffing Services. Manual position pre-test booklets are available in Staffing. You will receive a booklet should you be invited for testing. A physical examination may also be required.

Successful candidates will also be required to pass the examination for entrance into the grade of Lineperson 'C'. This position falls under the requirements of the Lineman Improvement Program which requires promotion to the maximum level within a specific time frame. Failure to do so will result in termination.

**DESIRED COMPETENCIES:** CUSTOMER SERVICE ORIENTATION, TEAM PLAYER, PROBLEM SOLVING, ACHIEVEMENT ORIENTATION, MOTIVATIONAL FIT, SAFETY AWARENESS, PRODUCTIVITY, TOLERANCE FOR STRESS.

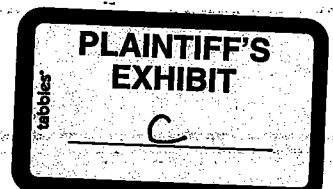
THIS POSITION REPORTS TO: Ken Toebe, T&D Projects East

EMAIL RESUME WITH REQUEST NO. TO: [resumes@cinergy.com](mailto:resumes@cinergy.com).

Please type your resume in the text area of the e-mail message INCLUDING THE REQUEST NO. AT THE BEGINNING OF THE TEXT. When submitting your resume you must include work history (including job title and listing of responsibilities) and education to be considered for the position. Do not attach the resume document into the message or send resume and cover letter separately. If you do not have access to e-mail, please forward a hard copy to Staffing Services, 65 Mezz. Your resume must be received by the end of business day on the date indicated above.

IF THE REQUEST NUMBER FOR THE POSTED JOB OPENING IS NOT INCLUDED ON YOUR RESUME, IT CANNOT BE TRACKED TO THE POSITION YOU ARE APPLYING FOR AND WILL NOT BE PROCESSED.

An Equal Opportunity Employer. Minority, Female, Disabled, Disabled Veteran, Vietnam Era Veteran.



**FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

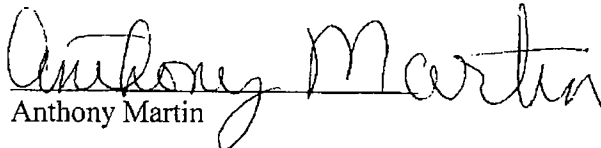
BILLY BRANTLEY, et al.	)	
	)	
Plaintiffs,	)	Case No. C-1-01-378
	)	
	)	<b>Judge Susan J. Dlott</b>
v.	)	
	)	PLAINTIFF, ANTHONY MARTIN'S,
	)	DECLARATION AS TO
CINERGY CORP.	)	AUTHENTICATION OF
	)	DOCUMENTS
	)	
Defendant.	)	

**DECLARATION OF ANTHONY MARTIN**

My name is Anthony Martin, and I am a plaintiff in the above-styled case. I make this declaration based on facts personally known to me.

1. The attached documents are true and correct copies of documents I obtained in my employment with Cincinnati Gas & Electric Co., which I understand to be business records of the company's regularly conducted business activities and which were made and kept as a regular practice of that business.

I declare under penalty of perjury that the foregoing is true and correct. Signed on this 22 day of September 2004 in Cincinnati, Ohio.

  
Anthony Martin





## MEASUREMENT TASK

Name ANTHONY J. MARTINDate 11-26-97Instructions

Use the 12 inch ruler to measure the following lines. Write the correct measurement in the space provided.

Answer

3  $\frac{1}{16}$ ~~4  $\frac{1}{8}$~~ 2  $\frac{9}{16}$ 4  $\frac{3}{4}$ 1  $\frac{1}{2}$ PLAINTIFF'S  
EXHIBITA

AUG 22 '97 03:04PM PSI ELECTRIC SHOP

P.6/15

INSTRUCTION #3 - POLE CLIMBINGNAME Tony DATE \_\_\_\_\_

- ☐ A. Completes with ease.  
☒ B. Completes with difficulty.  
☐ C. Cannot complete.

Observations HAD PROBLEM GETTING RIGHT HOOK  
FOR RIGHT FOOT. WATCHES FEET

AUG 22 '97 03:05PM PSI ELECTRIC SHOP

P.7/15

INSTRUCTION #4 - HOLE DIGGINGNAME Towry DATE \_\_\_\_\_

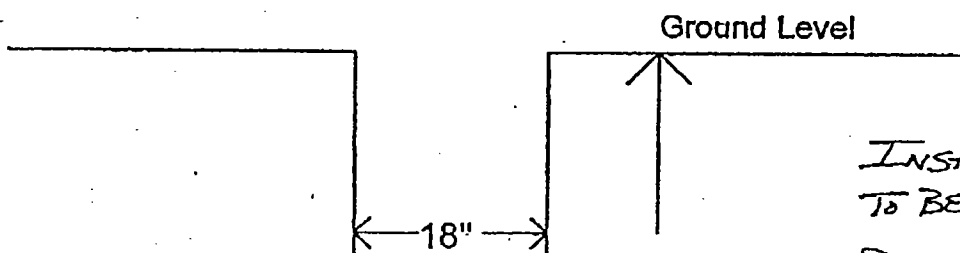
- ☐ A. Completes with ease.  
☐ B. Completes with some difficulty.  
☐ C. Did not complete.

18" square holeLocation OKDiameter 19" @ TOP 17" @ BOTTOMDepth 32"Elapsed Time 10Observations Don't like TO TAMP.  
ROCK.

AUG 22 '97 03:05PM PSI ELECTRIC SHOP

P.8/15

4. Dig, with proper tools, the hole indicated below.



*INSTRUCT CANDIDATE  
TO BE GIVEN 15 MINUTES*

INSTRUCTION #5 - HAMMER EXERCISE

NAME Toovy DATE \_\_\_\_\_

- ☐ A. Completes with ease.  
☒ B. Completes with some difficulty.  
☐ C. Did not complete.  
☐ D. Correct  
☐ E. Incorrect

Observations CAN'T HIT LAG SCREW  
\_\_\_\_\_  
\_\_\_\_\_

INSTRUCTION #6 - USING BLOCK AND TACKLENAME TOBY DATE \_\_\_\_\_

- ☒ A. Completes with ease.  
☐ B. Completes with some difficulty.  
☐ C. Did not complete.

Observations NO PROBLEM.  
\_\_\_\_\_  
\_\_\_\_\_

INSTRUCTION #8 - EQUIPMENT INSTALLATION

NAME Tony DATE \_\_\_\_\_

- ☐ A. Correct  
☒ B. Incorrect

Elapsed time 4 min

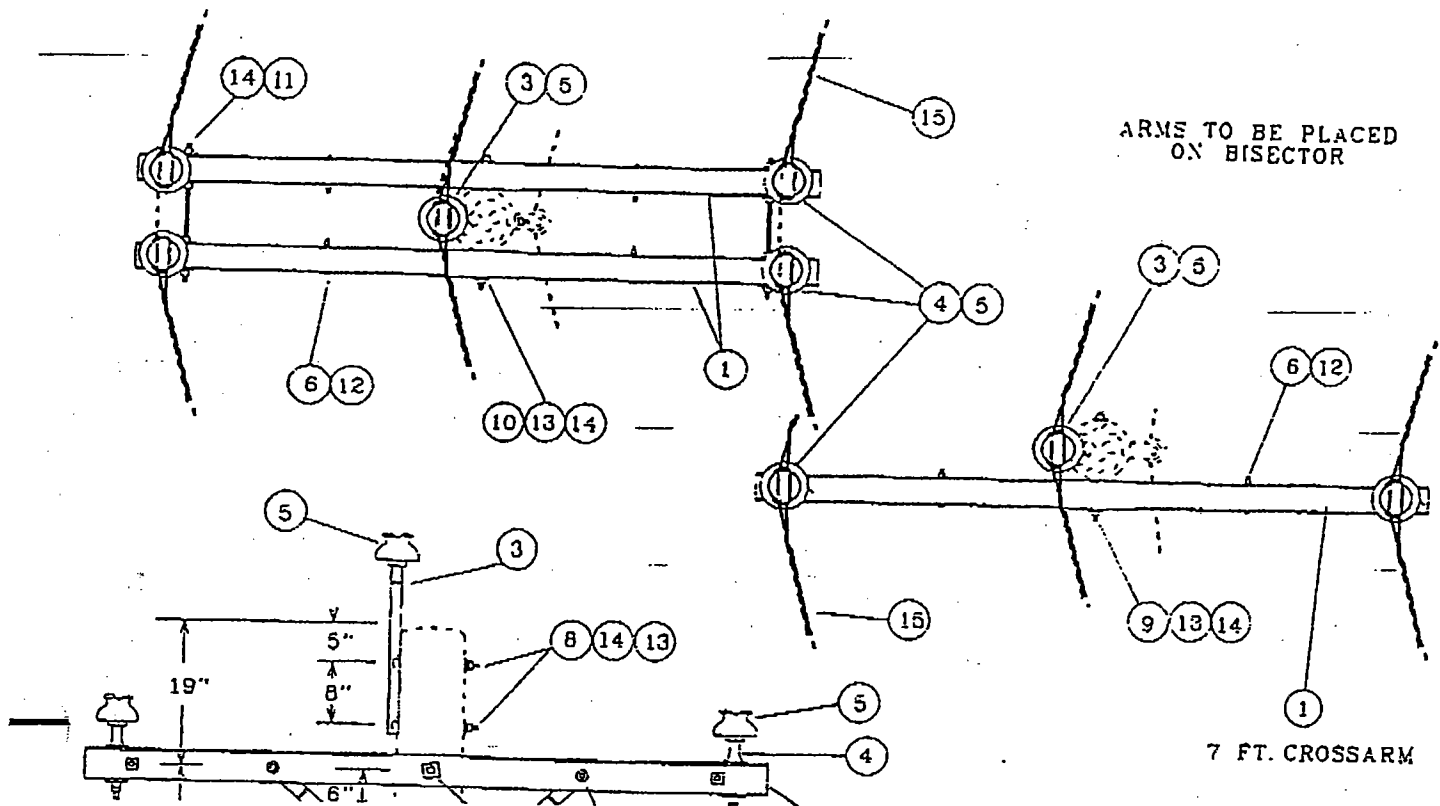
Observations TRIED TO DRILL HOLE BACKWARDS  
IM PROPER USE OF BRACE & BIT



AUG 22 '97 03:07PM PSI ELECTRIC SHOP

P.13/15

## DRAWING No 22140

15KV CLASS MULTIPHASE THROUGH LINE CONSTRUCTION  
FOR 4/0 AAAC AND SMALLER PRIMARY CONDUCTOR

INSTRUCTION #9 - LADDER USE

NAME Tony DATE \_\_\_\_\_

- ☐ A. Completes with ease.  
☒ B. Completes with some difficulty.  
☐ C. Did not complete.

Observations Does NOT sit ladder-out  
far enough @ Base.